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also provides that the owner shall have a lien upon cargo for "all freight demurrage and all other charges whatsoever," these provisions are not inconsistent, and the owner is entitled to a lien for demurrage notwithstanding it is stipulated that it shall be paid "day by day"; (2) he also held that "charges" did not include "dead freight" i. e., freight payable in respect of unused space.—Canada Law Journal.

Innkeepers—Liability for Injury to Guest.—The Supreme Court of Pennsylvania, in the recent case of *Lyttle v. Denny*, not yet reported, held that an innkeeper is liable to a guest, who is injured by the top of a folding-bed falling down upon him while he is occupying the bed. It was said that the degree of care required of an innkeeper for the safety of his guests was less than that required of a carrier of passengers, and the Court adopted the statement of the rule in *Beale on Innkeepers and Hotels*. "The innkeeper is bound to provide reasonably safe premises. * * * Both in original safety of construction and in maintenance, the premises must be such as reasonably to secure the safety of the guest."

Applying this rule, the Court held that there was no duty on the plaintiff to show the exact defect in the bed which caused it to fall down upon and entrap him. "Bearing in mind the duty of the innkeeper to guard with reasonable care the safety of his guests, proof of the happening of such an extraordinary accident cast the burden of explanation at once upon the defendant. The accident was so far out of the usual course that no fair inference can arise that it could have resulted from anything less than negligence upon the part of the management of the hotel. Beds do not usually operate as spring traps to close upon and catch the confiding guest."—National Corporation Reporter.

Negligence—Proximate Cause.—A somewhat novel question was involved in the decision in the case of *Houren v. Ry. Co.*, 86 N. E. 611, in which the Supreme Court of Illinois held that a railway company which, by obstructing the streets of a city, in violation of the statute, prevented the city fire department from reaching the plaintiff's house in time to extinguish a fire, was liable to the plaintiff for the loss thereby suffered. The statute in question forbids a railway company obstructing a public highway by stopping any train thereon for a longer period than ten minutes. The defendant, as a fact, failed to remove its train from across the public highway for more than thirty minutes. The court held that the evidence adduced tended to prove that if the fire department had not been prevented by this obstruction from reaching the scene of the conflagration, it would have been able to extinguish the fire before it spread to plaintiff's premises from the adjoining premises, in which it originated. Clearly, the railroad com-